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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

ORIGINAL
FILE

In the Matter of

Billed Party Preference
for 0+ InterLATA Calls

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CC Docket No. 92-77

REPLY COMMENTS OF CENTRAL TELEPHONE COMPANY

I. INTRODUCTION

Central Telephone Company ("Centel"), on behalf of itself and its affiliated local exchange companies ("LECs"), hereby submits this reply to the comments filed in response to the Notice of Proposed Rulemaking, FCC 92-169, released May 8, 1992 ("Notice") in the above-referenced proceeding. In the Notice, the Commission proposes to mandate the implementation of a nationwide system of billed party preference for all 0+ interLATA calls.

Centel supports the implementation of a nationwide system of billed party preference. Consumers would benefit greatly from such a system, because it would implement the billed party's choice of interexchange carrier ("IXC") without cumbersome access code dialing requirements. Set forth below is a discussion of suggested modifications which Centel believes will strengthen the Commission's billed party preference proposal.

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II. DISCUSSION

A. Billed Party Preference Should Apply to 0+ and 0- Calls

In the Notice, the Commission requests comment on its proposal to apply billed party preference to all 0+ interLATA calls.^{1/} Centel agrees with those parties who urge the Commission to apply billed party preference to all 0+ and 0- interLATA calls from any telephone.^{2/} No party has advanced a significant justification for limiting billed party preference to 0+ interLATA calls as the Commission proposes.

Since all 0- calls are routed to a LEC operator, those calls could be accommodated easily under a billed party preference system. Under such a system, the LEC operator would simply obtain from the caller the information necessary to determine the billed party's IXC and route the call accordingly. Consumers would benefit from applying billed party preference to 0+ and 0- calls, because all calls would be handled in a consistent and uniform manner.

^{1/} Notice at ¶ 25.

^{2/} See Comments of Ameritech Operating Companies ("Ameritech") at 7; Comments of Bell Atlantic Telephone Companies ("Bell Atlantic") at 3; Comments of BellSouth Telecommunications, Inc. ("BellSouth") at 17; Comments of NYNEX Telephone Companies ("NYNEX") at 21; Comments of Southwestern Bell Telephone Company ("SWBT") at 4-5; Comments of Southern New England Telephone ("SNET") at 8; Comments of US West Communications ("US West") at 6; Comments of GTE Service Corp. ("GTE") at 5; Comments of United States Telephone Association ("USTA") at 7; Comments of MCI Telecommunications Corp. ("MCI") at 6-7; Comments of Sprint Corp. ("Sprint") at 3, 29.

B. Billed Party Preference must be Deployed Ubiquitously

Centel agrees with those parties who argue that billed party preference must be deployed ubiquitously.^{3/} To accomplish that end, the Commission should mandate the implementation of billed party preference by all LECs and all providers of 0+ and 0-access. The Commission should also amend Part 68 of its rules to prevent traffic aggregators and private payphone providers from using automatic dialing mechanisms to dial around billed party preference.^{4/} Traveling consumers would become confused and frustrated if billed party preference was available in some areas of the country but not in others.

One of the issues affecting the ubiquitous deployment of billed party preference is the varying stages of technological deployment in the LEC networks. In order to implement a nationwide system of billed party preference, each LEC's network must be fully equipped with digital switching and common channel signaling ("SS7") technology. The need to convert LEC networks from analog to digital switching technology will slow down the billed party preference implementation process.

Some LECs, such as Centel, have already installed digital switching technology and have made significant progress in

^{3/} See e.g., Comments of Pacific Companies at 11-12; Comments of SWBT at 4-5; Comments of USTA at 7.

^{4/} See Comments of NYNEX at 21; Comments of Pacific Companies at 12; Comments of SNET at 8; Comments of US West at 16; Comments of USTA at 8.

deploying SS7 technology throughout their networks.^{5/} For those LECs, billed party preference could be implemented for a modest cost and in a short time frame.

For those LECs whose networks are still equipped with analog switching technology, the billed party preference implementation process would be more expensive^{6/} and time-consuming.^{7/} Deployment of digital and SS7 technology takes a planning horizon of years, not days. This is true because factors like depreciation rates and other cost recovery issues, particularly at the state level, make it impossible to upgrade LEC networks as quickly as some LECs would like. These factors add to the cost and delay in implementing billed party preference. The Commission should be sensitive to such factors and take appropriate steps to ensure that the LECs are able to deploy billed party preference ubiquitously.

^{5/} Seventy percent of Centel's local exchange network will be equipped with SS7 by the end of 1992.

^{6/} The LECs commenting in this proceeding submitted estimates that ranged from \$33 million to \$150 million. See Comments of SNET at 3; Comments of US West at A-2; Comments of BellSouth. See also Comments of Organization for the Protection and Advancement of Small Telephone Companies at 3-4.

^{7/} In their comments, the LECs estimated that billed party preference could not be implemented in less than 3 to 4 years. See Comments of Ameritech at 2; Comments of Bell Atlantic at 2; Comments of SWBT at 17; Comments of BellSouth at 17; Comments of US West at 11. Centel estimates that it could implement billed party preference within 12 months after the line information data base ("LIDB") return message is modified and the necessary software becomes available.

C. LECs must be Allowed to Recover their Costs

Centel's support for billed party preference is premised on the assumption that LECs will be allowed to recover fully the costs of implementing the system. It is imperative that a mechanism be established to assure full cost recovery. Centel joins with those parties who support the establishment of a separate billed party preference charge to be assessed on all IXCs which have 0+ and 0- calls routed to them.^{8/} The assessment of a separate per call charge on those IXCs is consistent with the Commission's policy of imposing the cost of a service on the cost causer. It will also prevent the LECs' general access rates from being saddled with additional extraneous costs, thereby enabling LECs to better compete with competitive access providers.

D. Callers will be Required to Provide Information Twice

In response to the Commission's request,^{9/} many parties submitted comments on the issue of whether billed party preference would require callers to provide certain information about their call twice. Some parties contend that after the deployment of Automated Alternate Billing Services ("AABS") and Operator Signaling System ("OSS7") at the LEC operator services switches, the use of two operators will no longer be

^{8/} See e.g., Comments of GTE at 12-13; Comments of Sprint at 21.

^{9/} Notice at ¶ 26.

necessary.^{10/} Other parties contend that while the instances in which the need for two operators will be reduced, there will continue to be a need for two operators on a limited class of calls.^{11/}

Centel shares the latter view. In instances where IXC's perform their own billing, there will continue to be a need for the LEC operator and the IXC operator to obtain call and billing information. The reason for this is that in today's technological environment, calling card information is not passed from the LEC to the IXC. Moreover, the implementation of AABS will not eliminate the need for two operators, since the AABS system can not handle all collect and third party billed calls. To eliminate the need for two operators, existing signaling technology would have to be modified. However, the need for such modifications should not prevent the Commission from going forward with the implementation of billed party preference.

E. Certain Issues should be Deferred

In the Notice, the Commission queried whether it would be feasible for LECs to perform 14-digit carrier identification

^{10/} See Comments of Ameritech at 14; Comments of Bell Atlantic at 8; Comments of SWBT at 13; Comments of US West at 7-8; Comments of Illinois Commerce Commission at 9; Comments of Pennsylvania Public Utility Commission at 5.

^{11/} See e.g., Comments of BellSouth at 13-14; Comments of the Pacific Companies at 5-6; Comments of Greater Orlando Aviation Association at i; Comments of GTE at 9; Comments of USTA at 7; Comments of American Telephone and Telegraph Co. ("AT&T") at 15; Comments of Capital Network Systems ("CNS") at 8-10; Comments of Competitive Telecommunications Association ("CompTel") at 14-17.

screening in LIDB and how commercial credit cards and foreign-issued calling cards would be handled in the billed party preference environment.^{12/} As the comments in this proceeding indicate, the accommodation of 14-digit screening and commercial credit cards and foreign-issued calling cards in the billed party preference system involves many complex and technical issues.^{13/}

For these reasons, Centel agrees with those parties who support the deferral of 14-digit screening and commercial and foreign-issued cards to a later phase in the implementation process.^{14/} After the basic billed party preference system becomes fully operational, the Commission and the public can explore whether or to what extent 14-digit screening and commercial and foreign-issued cards can be accommodated in the billed party preference system. Deferral of these issues will benefit the public by allowing the Commission and the telecommunications industry to gain experience from the operation of the basic billed party preference system.

^{12/} Notice at ¶ 11, n. 19; ¶ 34.

^{13/} See Comments of Ameritech at 11-13; Comments of Bell Atlantic at 3, 9; Comments of BellSouth at 7-9; Comments of Pacific Companies at 16; Comments of SNET at 6; Comments of SWBT at 5, 11; Comments of GTE at 10; Comments of USTA at 9; Comments of MCI at 6-8; Comments of Sprint at 11-13, 33-34; Comments of City of Fresno at 1; Comments of Michigan Public Service Commission at 6; Comments of NYCOM Information Services, Inc. at 10-11.

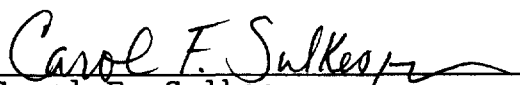
^{14/} See e.g., Comments of Ameritech at 11-12; Comments of SWBT at 5; Comments of GTE at 10; Comments of USTA at 9

III. CONCLUSION

Centel supports the implementation of a nationwide billed party preference system. Centel believes that consumers would benefit from applying billed party preference to all 0+ and 0-interLATA calls, not just 0+ calls as the Commission proposes. In addition, billed party preference should be deployed ubiquitously, and a separate per call charge should be established to enable LECs to recover the full cost of the system. Centel also believes that existing technology will have to be modified to obviate the need for callers to provide call information twice, and that issues relating to commercial and foreign billed credit cards and 14-digit screening should be deferred to a later stage in this proceeding.

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